

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

PLUMBERS AND STEAMFITTERS  
LOCAL 486 MEDICAL FUND,

\*

\*

Plaintiff,

\*

Civil Action No. MJG 03-219

v.

\*

RITA L. BOOKS, et al.,

\*

Defendants.

\*

\* \* \* \* \*

**JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE DISPOSITIVE  
MOTIONS**

Plaintiff, Plumbers and Steamfitters Local 486 Medical Fund, by and through its counsel, Kimberly L. Bradley, Corey Smith Bott and Abato, Rubenstein and Abato, P.A., and Defendants Rita L. Books, Roger Books and Nathaniel Fick, P.C., Client Trust Account (Amounts Held in Trust for Rita Books), by and through their counsel, Nathaniel Fick and Fick and Petty, P.C. together respectfully request this Honorable Court to extend the time by which the parties are required to file and respond to dispositive motions, and for their reasons therefore state:

1. This matter commenced with a filing of a Motion for Temporary Restraining Order and/or Preliminary Injunction;
2. A conference on the motion was held on January 29, 2003 in which the parties agreed to dismiss certain defendants;

3. Further, the amount of \$57,395.60, the subject of the dispute, was agreed to be remitted to the Clerk of the United State's District Court for the District of Maryland (Northern Division);

4. Finally, the parties agreed to a standard scheduling order with Plaintiff filing a Motion for Summary Judgement 60 days subsequent to the conference;

5. In accordance with those proceedings, the Court issued an Order on January 29, 2003;

6. The Order of January 29, 2003 set forth a schedule requiring Plaintiff to file a Motion for Summary Judgment by April 1, 2003 with reply motions to be filed accordingly;

7. On February 26, 2003 Plaintiff filed an Amended Complaint pursuant to Fed. R. Civ. P. 15(a) and L.R. 103.6.c.;

8. On March 14, 2003 Defendant filed a Motion to Dismiss Amended Complaint as to Defendant Nathaniel Fick, P.C. Client Trust Account;

9. Defendants Rita L. Books and Roger Books filed an Amended Answer to the Plaintiff's Amended Complaint on March 26, 2003.

10. Defendant Nathaniel Fick, P.C, Client Trust Account's Motion to Dismiss Amended Complaint was denied on May 2, 2003;

11. The parties believe a Motion for Summary Judgment would be improperly made prior to the filing of an Answer on behalf of Nathaniel Fick, P.C. Client Trust Account;

12. No party will be prejudiced by an extension of the dispositive motions deadline;

13. A trial date has not been set in the matter;

WHEREFORE Plaintiff Plumbers and Steamfitters Local 486 Medical Fund and Defendants Rita L. Books, Roger Books and Nathaniel Fick, P.C., Client Trust Account, jointly move for an extension of the deadline to file dispositive motions to 30 days after an Answer has been filed by all Defendants.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Nathaniel Fick  
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Attorneys for Defendants

Dated: May 16, 2003

\_\_\_\_\_/s/\_\_\_\_\_  
Kimberly L. Bradley  
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\_\_\_\_\_/s/\_\_\_\_\_  
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Attorneys for Plaintiff

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2003.

\_\_\_\_\_  
Marvin J. Garbis  
United States District Judge